



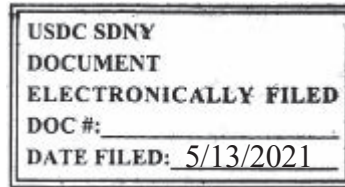
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May 12, 2021

VIA ECF

The Honorable Alison J. Nathan
United States District Judge
Southern District of New York
40 Foley Square, Room 2102
New York, NY 10007



The initial pretrial conference
is hereby adjourned to July 2,
2021 at 3:00 p.m.
SO ORDERED.

Re: Air Express Int'l USA, Inc. v. Maersk, Inc. et al.
Case No. 1:21-cv-01722-AJN

Alison J. Nathan
5/13/2021

Dear Judge Nathan,

We represent Plaintiff, Air Express International USA, Inc. d/b/a DHL Global Forwarding (hereinafter "Plaintiff" and/or "DGF"), in the above-referenced case. Pursuant to your Honor's Individual Practices ¶ 1(C) and ¶ 1(D), Plaintiff respectfully requests an adjournment of the Initial Pre-Trial Conference currently scheduled for Friday, May 21, 2021, at 3:00 p.m., along with an adjournment of the Proposed Civil Case Management Plan and Scheduling Order currently due on Friday May 14, 2021 [D.E. 12].

Plaintiff filed the instant matter as a protective time bar action against Defendants as the ocean carrier concerning alleged damages during the international movement of goods from Gioia Tauro, Italy to Miami, Florida. At this time, Plaintiff is in the process of serving Defendants and is further proceeding to file an amended complaint to add causes of action against the shipper/cargo interest with the goal of presenting all issues regarding the transactions and occurrences that are the subject of the pending complaint in one proceeding in an efficient manner. Accordingly, given the complex legal issues with amending the complaint, along with time to serve the Defendants, counsel for Plaintiff respectfully requests a forty-five (45) to sixty (60) day adjournment of the Initial Pre-Trial Conference and submission of the Proposed Civil Case Management Plan and Scheduling Order so that all parties have appeared. This is Plaintiff's first request for an adjournment of the Initial Pre-Trial Conference.

Thank you for your consideration in this matter.

Respectfully submitted,

SPECTOR RUBIN, P.A.
Andrew Spector
Andrew R. Spector

cc: All Counsel of Record (via ECF)